

REMARKS

Applicants respectfully request entry of the following amendments and remarks contained herein in response to the Office Action mailed December 1, 2005. Applicants respectfully submit that the amendment and remarks contained herein place the instant application in condition for allowance.

Upon entry of the amendments in this response, claims 1 – 19 remain pending. In particular, Applicants amend claims 1 – 19. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

I. Examiner Interview

Applicants first wish to express their sincere appreciation for the time that Examiner Truong spent with Applicants' Attorney, Anthony Bonner during a telephone discussion on January 24, 2006 regarding the outstanding Office Action. During that conversation, Examiner Truong seemed to indicate that it would be potentially beneficial for Applicants to make amendments contained herein. While no agreement was met, Examiner Truong seemed to indicate that amending the claims to more clearly define the reference identifier as a "sender defined reference identifier (ID)" would be beneficial. Thus, Applicants respectfully request that Examiner Truong carefully consider this response and the amendments.

II. Rejections Under 35 U.S.C. §103

In order for a claim to be properly rejected under 35 U.S.C. §103, the teachings of the cited art reference must suggest all features of the claimed invention to one of ordinary skill in the art. *See, e.g., In re Dow Chemical*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re*

Keller, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). Further, “[t]he PTO has the burden under section 103 to establish a prima facie case of obviousness. It can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references.” *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

A. Claim 1 is Patentable Over *Knauerhasse* in View of *Donovan*

The Office Action indicates that claim 1 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Publication Number 2003/0023691 (“*Knauerhasse*”) in view of U.S. Publication Number 2004/0193722 (“*Donovan*”). Applicants respectfully traverse this rejection for at least the reason that *Knauerhasse* in view of *Donovan* fails to disclose, teach, or suggest all of the elements of claim 1, as amended. More specifically, claim 1, as amended, recites:

A method processed by a computing device at a sender location, comprising the steps of:
receiving, by the computing device at the sender location, an instant messaging (IM) address of a contact of a sender;
receiving, by the computing device at the sender location, an email address of the contact of the sender;
receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the contact of the sender*;
correlating, by the computing device at the sender location, the IM address to the sender defined reference identifier; and
correlating, by the computing device at the sender location, the email address to the sender defined reference identifier (ID). (*emphasis added*)

Applicants respectfully submit that the cited art fails to disclose, teach, or suggest a “method processed by a computing device at a sender location, comprising the steps of... receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the contact of the sender*” as recited in claim 1, as amended. More specifically, *Knauerhasse* discloses that “preferences may either be collected based on input received from the user, or may be inferred from the user’s past actions or habits. For example, user Rob may have specified a priority scheme 517 – e.g., an order of preference in which his various communications channels should be used depending on accessibility that is to be used by Routing Decisions component” (p. 5, para 0038). As clearly illustrated in this passage *Knauerhasse* appears to disclose providing a user with the ability to manage his or her communications channels. Applicants respectfully submit that this is vastly different than a “method processed by a computing device at a sender location, comprising the steps of... receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the contact of the sender*” as recited in claim 1, as amended.

In addition, Applicants respectfully submit that *Donovan* does not overcome the deficiencies of *Knauerhasse*. More specifically, *Donovan* appears to disclose “a system which allows individuals to exchange messages and files over the Internet substantially instantaneously across multiple and different protocols an systems” (p. 1, para. 0002). Additionally, the Office Action appears to reject claim 1, stating “Donovan teaches [that]... [i]n order to gain access, the DUN component 32 sends the user’s ID and password to the SP 14’s authorization database” (OA p. 5, line 6). Applicants respectfully submit that “receiving, by the computing device at the

sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the contact of the sender*” is vastly different than an authorization database receiving a USERID and password, as disclosed in *Donovan*. For at least the reason that *Donovan* fails to overcome the deficiencies of *Knauerhasse*, Applicants submit that the combination of references does not disclose, teach, or suggest all of the claimed elements. For at least this reason, claim 1, as amended, is allowable over the cited art.

B. Claim 6 is Patentable Over *Knauerhasse* in View of *Donovan*

The Office Action indicates that claim 6 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Publication Number 2003/0023691 (“*Knauerhasse*”) in view of U.S. Publication Number 2004/0193722 (“*Donovan*”). Applicants respectfully traverse this rejection for at least the reason that *Knauerhasse* in view of *Donovan* fails to disclose, teach, or suggest all of the elements of claim 6, as amended. More specifically, claim 6, as amended, recites:

A method processed by a computing device at a sender location, comprising the steps of:

receiving, by the computing device at the sender location, sender input, the sender input comprising multiple instant messaging (IM) addresses of an individual contact of the sender, the multiple IM addresses comprising IM addresses from different IM accounts, each of the different IM accounts being adapted to transmit and receive IM messages using a different IM protocol;

receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the individual contact*; and

correlating, by the computing device at the sender location, each of the multiple IM addresses to the sender defined reference identifier (ID).
(emphasis added)

Applicants respectfully submit that the cited art fails to disclose, teach, or suggest a “method processed by a computing device at a sender location, comprising the steps of... receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the individual contact*” as recited in claim 6, as amended. More specifically, *Knauerhasse* discloses that “preferences may either be collected based on input received from the user, or may be inferred from the user’s past actions or habits. For example, user Rob may have specified a priority scheme 517 – e.g., an order of preference in which his various communications channels should be used depending on accessibility that is to be used by Routing Decisions component” (p. 5, para 0038). As clearly illustrated in this passage *Knauerhasse* appears to disclose providing a user with the ability to manage his or her communications channels. Applicants respectfully submit that this is vastly different than a “method processed by a computing device at a sender location, comprising the steps of... receiving, by the computing device at the sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the individual contact*” as recited in claim 6, as amended.

In addition, Applicants respectfully submit that *Donovan* does not overcome the deficiencies of *Knauerhasse*. More specifically, *Donovan* appears to disclose “a system which allows individuals to exchange messages and files over the Internet substantially instantaneously across multiple and different protocols an systems” (p. 1, para. 0002). Additionally, the Office Action appears to reject claim 6, stating “Donovan teaches [that]... [i]n order to gain access, the DUN component 32 sends the user’s ID and password to the SP 14’s authorization database” (OA p. 5, line 6). Applicants respectfully submit that “receiving, by the computing device at the

sender location, *a sender defined reference identifier (ID) from the sender, the sender defined reference identifier (ID) being adapted to identify the individual contact*” is vastly different than an authorization database receiving a USERID and password, as disclosed in *Donovan*. For at least the reason that *Donovan* fails to overcome the deficiencies of *Knauerhasse*, Applicants submit that the combination of references does not disclose, teach, or suggest all of the claimed elements. For at least this reason, claim 6, as amended, is allowable over the cited art.

C. Claim 11 is Patentable Over *Knauerhasse* in View of *Donovan*

The Office Action indicates that claim 11 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Publication Number 2003/0023691 (“*Knauerhasse*”) in view of U.S. Publication Number 2004/0193722 (“*Donovan*”). Applicants respectfully traverse this rejection for at least the reason that *Knauerhasse* in view of *Donovan* fails to disclose, teach, or suggest all of the elements of claim 11, as amended. More specifically, claim 11, as amended, recites:

A system processed by a computing device at a sender location comprising:

first receive logic, processed by the computing device at the sender location, the first receive logic configured to receive first sender input, the first sender input comprising multiple instant messaging (IM) addresses of an individual contact of the sender, the multiple IM addresses comprising IM addresses from different IM accounts, each of the different IM accounts being adapted to transmit and receive IM messages using a different IM protocol;

second receive logic, processed by the computing device at the sender location, the second receive logic configured to *receive second sender input, the second user input comprising a sender defined reference identifier (ID), the sender defined reference identifier (ID) being adapted to identify the individual contact*; and

correlate logic, processed by the computing device at the sender location, the correlate logic configured to correlate each of the multiple IM addresses to the sender defined reference identifier (ID), the sender

defined reference identifier (ID) being adapted to identify the individual contact. (*emphasis added*)

Applicants respectfully submit that the cited art fails to disclose, teach, or suggest a “system processed by a computing device at a sender location comprising... second receive logic, processed by the computing device at the sender location, the second receive logic configured to *receive second sender input, the second user input comprising a sender defined reference identifier (ID), the sender defined reference identifier (ID) being adapted to identify the individual contact*” as recited in claim 11, as amended. More specifically, *Knauerhasse* discloses that “preferences may either be collected based on input received from the user, or may be inferred from the user’s past actions or habits. For example, user Rob may have specified a priority scheme 517 -- e.g., an order of preference in which his various communications channels should be used depending on accessibility that is to be used by Routing Decisions component” (p. 5, para 0038). As clearly illustrated in this passage *Knauerhasse* appears to disclose providing a user with the ability to manage his or her communications channels. Applicants respectfully submit that this is vastly different than a “system processed by a computing device at a sender location comprising... second receive logic, processed by the computing device at the sender location, the second receive logic configured to *receive second sender input, the second user input comprising a sender defined reference identifier (ID), the sender defined reference identifier (ID) being adapted to identify the individual contact*” as recited in claim 11, as amended.

In addition, Applicants respectfully submit that *Donovan* does not overcome the deficiencies of *Knauerhasse*. More specifically, *Donovan* appears to disclose “a system which allows individuals to exchange messages and files over the Internet substantially instantaneously

across multiple and different protocols an systems” (p. 1, para. 0002). Additionally, the Office Action appears to reject claim 11, stating “Donovan teaches [that]... [i]n order to gain access, the DUN component 32 sends the user’s ID and password to the SP 14’s authorization database” (OA p. 5, line 6). Applicants respectfully submit that “second receive logic, processed by the computing device at the sender location, the second receive logic configured to *receive second sender input, the second user input comprising a sender defined reference identifier (ID), the sender defined reference identifier (ID) being adapted to identify the individual contact*” is vastly different than an authorization database receiving a USERID and password, as disclosed in *Donovan*. For at least the reason that *Donovan* fails to overcome the deficiencies of *Knauerhasse*, Applicants submit that the combination of references does not disclose, teach, or suggest all of the claimed elements. For at least this reason, claim 11, as amended, is allowable over the cited art.

D. Claims 2 – 5, 7 – 10, and 12 – 19 are Patentable Over *Knauerhasse* in View of *Donovan*

In addition, dependent claims 2 – 5 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. Dependent claims 7 – 10 are believed to be allowable for at least the reason that they depend from allowable independent claim 6. Dependent claims 12 – 19 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 11. *In re Fine, Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Further, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,


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